

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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**GEORGE WISHART,**

*Plaintiff,*

-against-

**PETER WELKLEY, et al.,**

*Defendants.*

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**DECLARATION**

**19-CV-6189**

**TONY ANGIULO**, pursuant to 28 U.S.C. §1746, declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am a senior investigator employed New York State Office of the Attorney General. My primary responsibilities relate to information technology, including searching and extracting data from computers. I have been employed by the NYSOAG for \_\_\_ years.
2. I coordinated the data extraction in this matter from Defendants' phones, emails and social media accounts.
3. I did receive a Samsung Galaxy phone from Mr. Opperman in April of 2020. However, my attempt to extract data from that phone was not successful as the phone was not operable. Accordingly, it was returned to Mr. Opperman.
4. Both Mr. Opperman and Mr. Swiatowy me with the login information for their social media accounts, as did the other Defendants in this matter. Their social media was able to be extracted via Cantasia, which is a screen-capture program and is not word-searchable. It is the program I am most familiar with using for extraction because it is used in criminal cases, which is where all my work in data extraction, prior to this case, occurred. However, when a second, word-searchable extraction program was used, I was

unable to extract Mr. Opperman's Twitter account or Mr. Swiatowy's Facebook account.

Accordingly, these two accounts were only extracted once and not twice.

5. I was unable to extract Mr. Welkley's WhatsApp and Skype accounts, despite my attempts to do so.
6. I was provided Mr. Sullivan's login for his two yahoo accounts and extracted them. I was not supplied with login information about his gmail account until recently. He subsequently provided me with the login information and the account has been extracted.

Dated: November 19, 2020  
White Plains, New York

s/Tony Angiulo  
TONY ANGIULO

### **CERTIFICATE OF SERVICE**

I certify that on November 20, 2020, I electronically filed the foregoing Declaration on behalf of the Served Defendants with the Clerk of the District Court using CM/ECF system, which sent notification of such filing to the following:

1. Joshua S. Moskovitz  
Bernstein Clarke & Moskovitz PLLC  
11 Park Place  
Suite 914  
New York, NY 10007
2. Robert Howard Rickner  
Rickner PLLC  
233 Broadway  
Suite 2220  
New York, NY 10279

And, I hereby certify that I have mailed, by the United States Postal Service, the document to the following non-CM/ECF participant(s):

1. n/a

LETITIA JAMES  
Attorney General of the State of New York  
Attorney for Served Defendants

s/ Hillel Deutsch  
HILLEL DEUTSCH  
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